

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Administration of the )

North American Numbering Plan )

CC Docket No. 92-237

**COMMENTS OF TELEPORT COMMUNICATIONS GROUP**

TELEPORT COMMUNICATIONS GROUP

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**COMMENTS OF TELEPORT COMMUNICATIONS GROUP**

Teleport Communications Group ("TCG") hereby responds to the above-captioned Notice of Inquiry ("NOI" or "Notice") issued by the Federal Communications Commission ("FCC" or "Commission"). TCG applauds the Commission for responding to the National Association of Regulatory Utility Commissioners ("NARUC")<sup>1</sup> call for an examination of the administration of the North American Numbering Plan ("NANP") and other associated numbering issues, including local number portability.

As a leading non-LEC local common carrier providing local public switched telecommunications services<sup>2</sup>, TCG is intimately acquainted with the public interest issues related to the efficient and effective allocation and use of

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<sup>1</sup> National Association of Regulatory Utility Commissioners, Petition for Notice of Inquiry Addressing Administration of the North American Numbering Plan, filed September 26, 1991.

<sup>2</sup> TCG's subsidiary, TC-Systems, Inc., currently provides Teleport Centrex<sub>SM</sub> and TeleXpress Network Service<sub>SM</sub> to business customers in the New York metropolitan area via its own switches. Teleport Centrex is analogous to LECs' Centrex offerings, while TeleXpress Network Service is analogous to LECs' PBX DID/DOD trunk offerings (e.g., New York Telephone Company's "Flexpath" service). TC-Systems, Inc. provides these services pursuant to authority granted by the New York Public Service Commission. Another TCG subsidiary, TC Systems-Illinois, Inc., has been certificated by the Illinois Commerce Commission to provide similar services via its own switches in the Chicago area. TCG is examining other markets in which to offer these or similar enhanced local switched telecommunications services.

numbering resources. Based on its own direct business experience, TCG has a unique understanding of the ways in which the current administration of the NANP and the lack of local telephone number portability serve as artificial barriers to the development of effective competition in the local public switched telecommunications market. TCG further believes that unless non-LECs are able to competitively offer local switched services, the Commission's goal of promoting the development of "competitive switched access networks" will not be realized.<sup>3</sup>

**I. OVERALL ADMINISTRATION OF  
THE NANP AND ASSOCIATED  
DATABASE AND LOCAL  
ADMINISTRATIVE FUNCTIONS  
SHOULD BE MOVED TO AN  
INDEPENDENT BODY**

Overall administration of the NANP, along with associated database and local administrative functions, should be removed from Bellcore and from the control of the local exchange carriers ("LEC"). These functions should be transferred to an independent body under the control of and accountable to all telecommunications common carriers offering local switched telecommunications

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<sup>3</sup> See, Second Notice of Proposed Rulemaking, CC Docket No. 91-141, Expanded Interconnection With Local Telephone Company Facilities, adopted September 17, 1992, released October 16, 1992, p. 17, para. 42: "... we tentatively conclude that the public interest benefits likely to result from measures that facilitate the development of competitive switched access networks will be substantial and will outweigh any potential detriments." (emphasis added).

The ability of non-LEC local common carriers to successfully compete to provide switched access networks as envisioned by the Commission, may ultimately depend on the degree to which such carriers are able to realize potential scale and scope economies -- which are available to LECs -- by utilizing their switching facilities to compete with the LECs to provide switched services in the adjacent local telecommunications market.

services<sup>4</sup>, and under the jurisdiction of appropriate national and local regulatory authorities.<sup>5</sup>

**A. Change Is Required In Order To  
Ensure The Natural Development Of  
The "Network Of Networks"**

Change in NANP administration is required to ensure that numbering resources are managed and allocated fairly and efficiently, so as not to inhibit the natural and publicly-beneficial development of broad and effective telecommunications competition.

There is growing consensus among industry observers, regulators and carriers that society's increasingly critical reliance on telecommunications, and the evermore sophisticated demands of telecommunications consumers, requires -- and is in fact already driving -- the development of a robust and seamlessly integrated "network of networks".<sup>6</sup> Such a "network of networks" will be

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<sup>4</sup> Including, for example, non-LEC local common carriers such as TCG, competitive access providers, cellular and other wireless carriers, and interexchange carriers.

<sup>5</sup> In the United States, these authorities would be the FCC for generic or national numbering issues, and state public utility commissions for local numbering issues.

<sup>6</sup> For instance, Ameritech Chairman and Chief Executive Officer William L. Weiss concurred with this vision of a "network of networks" in his remarks before the Federal Communications Bar Association on October 22, 1992. Chairman Weiss offered the following synopsis of Ameritech's vision:

Specifically, we believe today's multiplication of technologies, networks, and suppliers will soon create a huge supernetwork, made up of many suppliers both cooperating and competing with one another. Every customer soon will have a choice. (emphasis added).

Later in his remarks, Weiss underscored Ameritech's belief in the public interest benefits of a "network of networks":

provided by diverse, competing, interconnected carriers. These competing, interconnected carriers will provide secure and reliable facilities and services in direct response to consumer needs as they arise.

Critical to the operation of a competitively-provided "network of networks" will be the ability of all carriers to gain fair, efficient, and non-discriminatory access to, and control of, numbering resources and associated administrative and database processes. If such access and control is not made available, consumers will not receive the competitively-provided services they require, because the LECs have incentives to utilize their control over the NANP in order to gain artificial advantages over new entrants and rival suppliers.<sup>7</sup>

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Ameritech favors the advance of competition -- some have said boldly -- because we believe that total and full competition, including in the local exchange, is inevitable; because it will be healthy for the nation and the consumer; and because it does not threaten universal service.

<sup>7</sup> TCG's experience offering switched services in the New York metropolitan area demonstrates how current number administration practices handicap competitors' abilities to offer services. Although TCG provides enhanced local public switched telecommunications services via its own switching facilities, under a Certificate granted by the New York Public Service Commission, and pursuant to tariff, and although these services require the allocation and assignment of telephone numbers to users of these services, TCG does receive direct assignments of central office (CO) codes (NXX codes -- a block of 10,000 station numbers with the same three digit prefix; i.e., an exchange), as does the LEC against which TCG competes. Instead, TCG has been required to lease CO codes (or number blocks within CO codes) from the local exchange carrier to which the codes have been directly assigned. Unlike the LEC which pays nothing for the use of the codes it has been assigned, TCG must pay a significant **non**-cost based monthly fee for each and every station number in each and every CO code or number block which is reserved for use by TCG in providing service to customers. The lack of direct assignment of these codes to TCG's switches, the inability of TCG to have its codes and switches listed in the local exchange routing guide (LERG), and the requirement that TCG pay for each reserved number, places TCG at a distinct -- yet wholly artificial -- competitive disadvantage vis-a-vis the New York Telephone Company.

To some extent, this situation may be alleviated by the implementation of new CO Code Assignment Guidelines on which TCG and other industry participants have been laboring over the past year. However, these guidelines are not even scheduled to be completed until July 1993, with implementation to

Furthermore, even with the best of intentions, LECs and LEC-dominated organizations can not be expected to administer the NANP in a manner which is responsive to the needs of non-LEC carriers and their customers. For example, recent North American Numbering Plan Administration (NANPA) proposals on the Long-Range Numbering Plan and on CO Code Assignment Guidelines betray basic misunderstandings of the needs of competitive carriers today and in the future.<sup>8</sup>

**B. An Independent Body Should Administer The NANP And Associated Databases**

For all reasons described above, an independent body should be established to take over all administrative and support system responsibilities for the NANP. Specifically, this new administrative body should be responsible for:

1. All activities currently performed by Bellcore's North American Numbering Plan Administration (NANPA);
2. All NANP administration functions currently performed by various

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follow at some unspecified point thereafter.

<sup>8</sup> See, for example, NANPA's Long Range Numbering Plan straw proposal which NANPA intends to use as a guide through at least the year 2025 AD. Section 4.4 of the proposal contains the following statement:

The proposed total reservation of 470 NPA codes as detailed above in Sections 4.1-4.3 does not address the potential for unanticipated events, unidentified number resource applications, unanticipated growth, and/or the desired maximal longevity of the 10-digit NANP format.

1. Unanticipated events - changes in national state, provincial, or local public policy decisions that may require the allocation of additional numbering resources. An example [of an unanticipated event] is the potential for local exchange competition that could require assignment of CO codes to multiple local exchange carriers. (emphasis added).

LECs in their respective service territories (e.g., CO code assignments);

3. All related database and information dissemination functions currently performed by Bellcore's Traffic Routing Administration (TRA)<sup>9</sup>; and
4. Any other general database or administrative functions associated with numbering resources; e.g., the 800 number portability database.

In order to ensure that this new administrative body is as independent and impartial as possible, it should be governed by an independent board composed of all common carriers which utilize NANP number resources to provide telecommunications services -- this would include carriers, such as TCG, which have been artificially precluded from receiving direct NANP number assignments. Each individual carrier should have a single vote in the deliberations of the board. However, funding for the new administrative body should be borne by all carriers in proportion to the number resources each individual carrier is directly assigned. Finally, all decisions of the governing board or the administrative body should be subject to an expedited appeals process before the appropriate regulatory authorities.

## **II. LECs SHOULD IMPLEMENT LOCAL T E L E P H O N E N U M B E R P O R T A B I L I T Y A S S O O N A S P O S S I B L E**

TCG has been a leading proponent of local telephone number portability. Local telephone number portability refers to the ability of a customer to retain its telephone number within a Numbering Plan Area (NPA), regardless of

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<sup>9</sup> For example, oversight and administration of the Routing Database System (RDBS), the database from which Local Exchange Routing Guides are generated, and the Bellcore Rating Administrative Data System (BRADS), the large database that contains NANP rating information.

whether the customer changes locations or local carriers within the NPA. In essence, telephone number control would be conferred upon the customer to whom the number is assigned for as long as the customer remains in the geographic NPA associated with that telephone number.

Local telephone number portability is essential to the development of effective local switched services competition. Many customers, especially large, telecommunications-dependent, multi-line business users, have developed proprietary interests in their telephone numbers. The costs of reprogramming PBXs, key systems and other CPE, of revising stationary, business cards and other materials, and of instilling in employees and clients an ability to easily and quickly recognize new telephone numbers, may discourage such customers from changing local carriers, even if they are dissatisfied with their current local carrier, and believe they could receive a superior service/price combination from another carrier.

With number portability, customers will gain control and sovereignty over their own telephone numbers, freeing them to use those numbers in conjunction with the local carriers of their choice. Furthermore, by allowing telephone numbers to be assigned among switches and carriers individually, rather than in NXX blocks of 10,000, number portability will allow for the more efficient and effective use of the number supply.

TCG believes that local telephone number portability can be efficiently and cost-effectively implemented as LECs deploy SS7 and AIN capabilities in their networks. The additional cost of implementing number portability as part of LECs' planned SS7/AIN deployments should be minimal since Local Number Portability is expected to be a normal AIN feature. There should be little



additional cost to extend such portability to apply between carriers as well as between a single LEC's central offices.

To ensure that carrier number portability is implemented as soon as practical and at minimum cost, the Commission (and state PUCs) should encourage or direct LECs to deploy SS7/AIN capabilities in their networks in a manner which is conducive to and consistent with the eventual implementation of full local number portability.

### **CONCLUSION**

Teleport Communications Group respectfully submits these comments in the Commissions Notice of Inquiry on Administration of the North American Numbering Plan. TCG recommends that the Commission direct the formation of an independent administrative body to assume all NANP administrative functions, as described above, and that the Commission take whatever actions it can to encourage the implementation of local telephone number portability, as soon as practically possible.

Respectfully submitted:

TELEPORT COMMUNICATIONS GROUP

A handwritten signature in cursive script, reading "Alex J. Harris", written over a horizontal line.

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